

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

District of Maryland

AUG 12 2014

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

United States of America
v.
DOMINIC WILLIAM PARKER

Case No.

BY
14-1804 TJS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 11, 2014 in the county of Baltimore City in the
District of Maryland, the defendant(s) violated:

Code Section

21 U.S.C. Section 846

Offense Description

Attempted Possession With Intent to Distribute 5 Kilograms or More of
Cocaine and 1 Kilogram or More of Heroin;
Conspiracy to Possess With Intent to Distribute 5 Kilograms or More of
Cocaine and 1 Kilogram or More of Heroin

This criminal complaint is based on these facts:

See Attached Affidavit

☐ Continued on the attached sheet.

Complainant's signature

Eric Nye, S/A FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/12/2014

Judge's signature

City and state: Baltimore, Maryland

Timothy J. Sullivan, U.S. Magistrate Judge

Printed name and title

4-1804TJS

4-1805TJS

AFFIDAVIT OF ERIC S. NYE, SPECIAL AGENT
DEPARTMENT OF JUSTICE, FEDERAL BUREAU OF INVESTIGATION

I, ERIC S. NYE, being duly sworn, do hereby depose and state:

Introduction:

1. Your affiant is a Special Agent for the Department of Justice, Federal Bureau of Investigation (DOJ/FBI). I have been a Special Agent since 2006 and assigned to the Safe Streets Task Force (SSTF) of the Baltimore office of the FBI since 2008.

2. This affidavit is made in support of a complaint against **Dominic William Parker**, of 5106 Windsor Mill Road, Gwynn Oak, Maryland and **Jermaine Cannady**, 2004 Eutaw Place, Apartment 1D, Baltimore, Maryland charging them with conspiracy and attempted possession with intent to distribute, cocaine and heroin, in violation of 21 U.S.C. § 846.

Details of the Investigation:

3. The FBI arrested Cooperating Witness 1 ("CW1") with several kilograms of both heroin and cocaine. CW1 indicated to the FBI his desire to cooperate. CW1 indicated that he had many multi-kilogram buyers in Baltimore to whom he was intending on selling the seized cocaine and heroin. Two of those buyers were identified by CW1 as Jermaine Cannady, aka "Main" and Dominic Parker, aka "Nick." CW1 was shown pictures of both and positively identified Cannady and Parker. CW1 explained that his "right hand man" was Cannady.

4. On August 11, 2014, CW1 made multiple consensually recorded calls in which Cannady indicated a desire to obtain both heroin and cocaine. At approximately 9:27 a.m., CW1 called Cannady and stated, "Call Nick, wake him up." Cannady replied, "Alright...I'm getting ready to call him now." CW1 stated, "Wake his ass up... 'cause I don't want fat boy and any other them motherfuckers, just Yo." Cannady replied, "You already know that." CW1 clarified to your affiant that he was ensuring that Cannady did not receive a ride by an unwitting driver but that he was driven by a coconspirator and knowing participant in the distribution of cocaine, that being Parker. Later in the call Cannady stated, "You got to...to make sure it's both man." CW1 replied, "Of course...hey, hey...A1." CW1 clarified that Cannady was inquiring about both heroin and cocaine and that CW1 assured him that he would have both and that they were good quality. In a later call, CW1 asked Cannady if he had "gotten some bread together" in reference to money, and Cannady explained that he had not. At approximately 12:11 p.m., CW1 placed a call to Cannady in which Parker got on the phone. CW1 and Parker discussed Parker's need to go run some errands prior to their meeting. CW1 explained to Parker that he can do that later and that they needed to come see him first.

5. At approximately 1:05 p.m., Cannady and Parker arrived at the Target parking lot and parked their vehicle next to CW1. At that time, Cannady and Parker were approached by agents of the FBI and placed under arrest. Cannady and Parker were not in possession of cash. CW1 explained that both Cannady and Parker are usually provided with kilograms of cocaine and heroin without payment up front. Even though Cannady was usually provided with the cocaine and heroin without payment up front, per your affiant's instructions, CW1 asked if Cannady had gotten some "bread together" as described in paragraph 4 above. CW1 explained that they were expecting to receive both heroin and cocaine.

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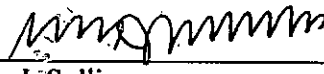
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Conclusion:

6. Therefore, based on the facts set forth above, your affiant believes there is probable cause that Dominic William Parker, of 2004 Eutaw Place, Apartment 1D, Baltimore, Maryland and Jermaine Cannady, of 2004 Eutaw Place, Apartment 1D, Baltimore, Maryland, attempted, and conspired, to possess with the intent to distribute five kilograms or more of cocaine, a Schedule II controlled substance, and one or more kilograms of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 846.


ERIC S. NYE, Special Agent
Department of Justice, Federal Bureau of Investigation

Subscribed and Sworn to before me and in my presence, this 12th day of August 2014, at Baltimore, Maryland.


Timothy J. Sullivan
United States Magistrate